

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

NATIONAL RIFLE ASSOCIATION OF  
AMERICA,

*Plaintiff and Counter-Defendant,*

and

WAYNE LAPIERRE,

*Third-Party Defendant,*

v.

Case No. 3:19-cv-02074-G

ACKERMAN MCQUEEN, INC.,

*Defendant and Counter-Plaintiff,*

and

MERCURY GROUP, INC., HENRY  
MARTIN, WILLIAM WINKLER,  
MELANIE MONTGOMERY, AND JESSE  
GREENBERG,

*Defendants.*

**DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION FOR LEAVE TO FILE  
UNDER SEAL CERTAIN EXHIBITS TO THEIR MEMORANDUM OF LAW IN  
OPPOSITION TO DEFENDANTS' MOTION TO DISQUALIFY PLAINTIFF'S  
COUNSEL**

Ackerman McQueen, Inc. (“*AMc*”), Mercury Group, Inc. (“*Mercury Group*”), Henry Martin (“*Martin*”), William Winkler (“*Winkler*”), Melanie Montgomery (“*Montgomery*”), and Jesse Greenberg (“*Greenberg*”) (collectively, “*Defendants*”) file this *Response to Plaintiff's Motion for Leave to File Under Seal Certain Exhibits to Their Memorandum of Law in Opposition to Defendants' Motion to Disqualify Plaintiff's Counsel* (the “*Response*” to the “*Motion*” by the “*NRA*”) (ECF 123), and respectfully show as follows:

On May 4, 2020, the NRA filed its Motion to submit supporting evidence for its *Response to Defendants' Motion to Disqualify Plaintiff's Counsel*. See ECF 121, 123. Specifically, the NRA moved to file under seal certain deposition excerpts from Millie Hallow (and deposition Exhibit 15) and Carolyn Meadows (and deposition Exhibit 10). ECF 123 at 1-2. While Defendants do not oppose the Motion, Defendants object that the above-referenced documents are confidential, and intend to seek the appropriate relief with the court in the event that they are unable to reach an agreement with the NRA. Defendants do not intend to waive, and expressly reserve, their rights to challenge the confidentiality designations of those four documents.

Dated: May 25, 2020.

Respectfully submitted,

/s/ G. Michael Gruber

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**GROUP, INC., HENRY MARTIN, JESSE**  
**GREENBERG, WILLIAM WINKLER, AND**  
**MELANIE MONTGOMERY**

**CERTIFICATE OF SERVICE**

I hereby certify that on May 25, 2020, I filed the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas. I hereby certify that I have served the document on all counsel and/or pro se parties of record by a manner authorized by Federal Rules of Civil Procedure 5(b)(2).

*/s/ G. Michael Gruber*  
G. Michael Gruber, Esq.